REMARKS

The present amendment is responsive to the Office Action mailed in the above-referenced case on October 18, 2002, made Final.   In the Office Action claims 6-9, and 14-16 are standing for examination. Claims 6-7 are rejected under 35 U.S.C. § 102(e) as being anticipated by Ginsberg (US 6064730) hereinafter Ginsberg. Claims 8-9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ginsberg in view of Bateman (US 5884032) hereinafter Bateman. Claims 6-9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Andrews (US 5848143) hereinafter Andrews in view of Gottlieb (US 5920621) hereinafter Gottlieb, and further in view of Lindeberg et al. (US 6049479) hereinafter Lindeburg. Finally, Claims 14-16 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Andrews.

Applicant has studied the prior art provided by the Examiner in detail, and the Examiner's remarks in rejection of the claims and in the "Response to Arguments" portion of the Office Letter. In response, applicant herein amends the claims in order to more particularly point out the subject matter believed to be patentable. Applicant asserts additional arguments and clear reasoning which distinguish unarguably over the art provided by the Examiner.

Applicant herein amends the claims to positively recite that the SCP, and routing servers in the Internet control and route IPNT calls to a plurality of destinations, which m oreaccurately reflects the abilities of a Service Control Point in a network as disclosed in applicant's invention.

Applicant points out that the routing system of Ginsberg is at the customer premises and serves only that customer. Further, because the routing of calls in Ginsberg is controlled by the caller, i.e., using the graphical display, there is no motivation present to provide a service control point, CTI, or an initial call processing point at the network. In the art of Ginsberg the customer views the

call center information and chooses which agent queue to enter, or which information to receive. There is no need for an initial call routing facility as disclosed and claimed in applicant's invention.

Applicant argues that the SCP processor of applicant's invention uses activity information, including one or more of call volume, agent status, and agent skills, received from the two or more call centers to select the agent addresses at agent workstations in the two or more call centers to route the incoming IPNT calls. In the art of Ginsberg the caller actually performs most of these functions and decisions. Therefore, there is no motivation to combine Ginsberg with any other telephony references to accomplish applicant's invention as claimed because a true SCP is not required in the system of Ginsberg. SCP's as known in the telephony art are computerized service control points that provide central routing intelligence which is not needed in Ginsberg because the "intelligence" comes from the caller.

Applicant argues that the art of Andrews also provides only a server at the customer premises serving only that customer. Applicant's independent claims clearly recite an SCP at the Internet level, capable of routing calls to two or more IPNT-capable call centers.

Applicant argues that the claims as recited in applicant's invention recite that the SCP is in the Internet serving two or more call centers. The SCP's as taught in Lindeberg and Gottlieb are not Internet protocol capable. Applicant argues that SCP's in the Internet are not known in the art. Therefore, there is no motivation to make the combination of Andrews with Gottlieb or Lindeberg. The only suggestion or motivation to place intelligent routing in the Internet by actually having a physical SCP in the Internet is only suggested in applicant's invention.

The combined art presented by the Examiner cannot produce applicant's claimed invention, as claimed and argued above. Applicant believes independent claims 6, 14 and 16 are clearly patentable over the 102 and 103 rejection

presented by the Examiner. Claims 7-9, and 15 are patentable at least as depended from a patentable claim.

Applicant points out that at the time of the present patent application data networks, for example, the Internet, are considered largely "dumb" networks rather than intelligent networks, although some routing is done. Applicant's invention provides a truly intelligent Internet routing system executing at the Internet level for the first time in the art.

As all of the claims, as amended, presented by the applicant have been shown to be patentable over the prior art in this case, applicant respectfully requests reconsideration to allow the claims, and the case passed quickly to issue.

If any fees are due beyond fees paid with this amendment, authorization is made to deduct those fees from deposit account 50-0534. If any time extension is needed beyond any extension requested with this amendment, such extension is hereby requested.

Version With Markings to Show Changes Made

In the claims:

6. (Thrice Amended) An Internet Protocol Network Telephony (IPNT) call-routing system for routing incoming IPNT calls to [at least one] agent [workstation] workstations in [an] two or more IPNT-capable call [center] centers, comprising:

an initial call-processing system in the Internet receiving IPNT calls from customers in the Internet, and including a Service Control Point (SCP) processor routing the incoming IPNT calls to selected agent addresses at the [at least one] two or more call [center] centers;

characterized in that the SCP processor uses activity information, including one or more of call volume, agent status, and agent skills, received from the [at least one] two or more call [center] centers to select the agent addresses at agent workstations in the [at least one] two or more call [center] centers to route the incoming IPNT calls.

7. (Once Amended) The IPNT call-routing system of claim 6 wherein the SCP processor communicates with a Computer Telephony Integration (CTI) processor at the [at least one] two or more call [center] centers by TCP/IP protocol.

8. (Once Amended) The IPNT call routing system of claim 7 wherein the CTI processor and the plurality of computer platforms are connected on a local area network at the [call center] two or more call centers.

9. (Once Amended) The IPNT call routing system of claim 8 further comprising a data server processor [is] connected to the LAN, the data server processor running an instance of a database comprising data associated with customers placing incoming calls to the call routing system.

14. (Twice Amended) An Internet Protocol Network Telephony (IPNT) call processing system in the Internet for routing incoming calls to <u>agent workstations in</u> at least [one agent workstation in an] <u>two or more</u> IPNT-capable call [center] <u>centers</u>, comprising:

an Internet routing server in the Internet for routing IPNT calls <u>to the two or more call centers</u>; and

a database connected to the Internet routing server receiving and storing processed information about transactions in the call [center] <u>centers</u>, including at least one of call volume, agent status, or agent skills at the [remote IPNT] call [center] <u>centers</u>;

wherein the Internet routing server selects final destinations for the incoming calls based on the stored processed information about transactions at the IPNT-capable call centers.

16. (Once Amended) A method for routing an incoming IPNT call to a selected destination, comprising steps of:

(a) collecting information at a computer telephony integration (CTI) processor in an IPNT call center regarding operations of the call center;

(b) processing the collected information;

(c) transferring the processed information to a database associated with a routing processor in the Internet network for intercepting and routing incoming calls <u>to a plurality of IPNT-capable call centers</u>;

(d) receiving <u>an</u> incoming IPNT call at the routing processor;

(e) retrieving the processed information from the database; and

(f) selecting a destination for the call based on the processed information retrieved.

Respectfully Submitted,

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